

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.,

Plaintiffs,

v.

CASE NO. 24-cv-40 EAW-MJR

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

NOTICE OF MOTION

MOTION ON BEHALF OF: Non-party, Clover Management, Inc.
("Clover"), by and through its attorneys, Woods Oviatt
Gilman LLP

DATE, TIME & PLACE: At a date and time to be set by the Court before the
Hon. Michael J. Roemer, United States Magistrate
Judge, at the Robert H. Jackson United States Courthouse,
2 Niagara Square Buffalo, New York 14202

Oral argument is requested.

SUPPORTING PAPERS: Declaration of Teia M. Bui, dated November 19, 2024, with
annexed exhibits; Declaration of Brian D. Gwitt, dated
November 21, 2024, with annexed exhibits; and all prior
pleadings and proceedings had herein.

RELIEF REQUESTED: An Order lifting the Stay Order so that Fund V and Fund VI
can make capital calls to dilute Blaise, Fusion, and Axel's
membership interests.

